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FILED US District Court-UT  
NOV 18 20 PH02:40

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH,

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PATRICK JUDE ABBOTT,

Defendant.

INDICTMENT

Count 1: 18 U.S.C. § 1343 (Wire Fraud)

Case: 2:20-cr-00382  
Assigned To : Barlow, David  
Assign. Date : 11/18/2020  
Description:

The Grand Jury alleges:

I. BACKGROUND

At all times relevant to this Indictment:

1. Defendant PATRICK JUDE ABBOTT (ABBOTT) was a resident of Texas.
2. Defendant ABBOTT was the founder and owner of 2D Global, LLC (“2D”).
3. 3M Company (“3M”) is a Delaware corporation having its principal place of

business in St. Paul, Minnesota. 3M is in the business of manufacturing and selling a wide variety of medical, consumer, commercial and industrial products, including mask products.

**Count 1  
18 U.S.C. § 1343  
(Wire Fraud)**

**II. THE SCHEME AND ARTIFICE TO DEFRAUD**

4. Beginning on or about February 1, 2020, and continuing until on or about September 11, 2020, in the District of Utah, and elsewhere,

PATRICK JUDE ABBOTT,

defendant herein, devised and intended to devise a scheme to defraud consumers, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and omissions of material facts.

5. In executing and attempting to execute the scheme and artifice to defraud, and in furtherance thereof, defendant ABBOTT knowingly transmitted and caused to be transmitted, wire communications in interstate commerce in violation of 18 U.S.C. § 1343 (Wire Fraud).

**III. OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD**

6. It was the object of the scheme and artifice to defraud for defendant ABBOTT to fraudulently obtain money through false statements, misrepresentations, deception, fraudulent conduct, and omissions of materials facts, and thereafter cause money to be diverted for his own and others' personal use and benefit.

**IV. MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD**

7. In execution and furtherance of the scheme and artifice to defraud, defendant ABBOTT, made one or more of the following false and fraudulent representations:

- a. That he was a representative for the company 3M and was authorized to sell its N95 respirators;
- b. That he had access to 200 million respirators but had already allocated 60 million, leaving approximately 140 million respirators for sale;

- c. That he could broker a deal for millions of 1860 N95 respirators for \$3.00 per unit; and
  - d. That he had previously brokered successful, large respirator deals with 3M products.
8. On or about the date listed below, in the District of Utah and elsewhere,

PATRICK JUDE ABBOTT,

defendant herein, having devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, promises, and omissions of material facts, and for the purpose of executing such scheme and artifice and attempting so to do, did knowingly transmit and cause to be transmitted by means of wire communication certain writings signs and signals, that is, an interstate wire, in instances including but not limited to the count below:

COUNT	DATE	WIRE COMMUNICATION
1	09/08/2020	Text message from defendant ABBOTT's cell phone, number (214) 998-8457, in Houston, Texas, to his intended victim, in Salt Lake City, Utah

All in violation of 18 U.S.C. § 1343.

A TRUE BILL:

*[Signature]*  
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FOREPERSON OF THE GRAND JURY

JOHN W. HUBER  
United States Attorney

*Ruth Hackford-Peer*

JACOB J. STRAIN  
RUTH HACKFORD-PEER  
Assistant United States Attorneys